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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GOPI VEDACHALAM and KANGANA  
BERI, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

TATA CONSULTANCY SERVICES,  
LTD, an Indian Corporation and TATA  
SONS, LTD, an Indian Corporation.

Defendants.

CASE NO. C 06-0963 (CW)

**STIPULATION AND [PROPOSED] ORDER  
TO EXTEND SUMMARY JUDGMENT  
BRIEFING SCHEDULE**

1           **IT IS HEREBY STIPULATED AND AGREED** by plaintiffs Gopi Vedachalam and  
 2           Kangana Beri (collectively “Plaintiffs”) and defendants Tata Consultancy Services, Ltd. and Tata  
 3           Sons, Ltd. (collectively “Defendants”), through their respective counsel, as follows:

4           **WHEREAS**, in the April 18, 2012 Case Management Conference Statement, Plaintiffs  
 5           informed Defendants and the Court that “Plaintiffs anticipate filing a motion for summary  
 6           judgment within the next thirty days.” Dkt. No. 279.

7           **WHEREAS**, at the April 25, 2012 Case Management Conference, Plaintiffs reiterated  
 8           their intention to file a summary judgment motion within that time frame.

9           **WHEREAS**, in the April 18 Case Management Conference Statement, Defendants  
 10          informed Plaintiffs and the Court that they “oppose Plaintiffs’ filing of a motion for summary  
 11          judgment at an early date” before the conclusion of discovery and reiterated that position at the  
 12          April 25, 2012 Case Management Conference;

13          **WHEREAS**, the Court directed that if in fact Plaintiffs filed a motion for summary  
 14          judgment prior to the completion of discovery, Defendants would be free to “file [a] . . . motion to  
 15          stay or . . . [an] administrative motion to stay, and say [they] really think it would be inefficient  
 16          for [Defendants] and the court to have to respond, and then [the court will] consider deferring it.”

17          **WHEREAS**, on May 18, 2012, Plaintiffs filed their Notice of Motion and Motion for  
 18          Summary Judgment (“Motion”) on the date specified in their prior representations to Defendants  
 19          and the Court;

20          **WHEREAS**, Plaintiffs noticed the hearing on the Motion for June 28, 2012 at 2:00 pm,  
 21          making the deadline for Defendants’ opposition June 1, 2012; and the deadline for Plaintiffs’  
 22          reply June 8, 2012;

23          **WHEREAS**, on May 23, 2012, Defendants requested that Plaintiffs stipulate to a four-  
 24          week extension until June 27, 2012 for Defendants to file a response to Plaintiffs’ Motion.  
 25          Defendants informed Plaintiffs that two of Defendants’ attorneys would be out of town on  
 26          business for ten days, including one of Defendants’ lead attorneys, and would not return to the  
 27          office until June 11; that several of Defendants’ attorneys would be out of town during the  
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1 Memorial Day weekend; and that certain of Defendants' attorneys are in India collecting  
2 documents.

3       **WHEREAS**, solely to avoid additional motion practice, Plaintiffs agree to an extension  
4 until June 13, 2012 for Defendants to file a response to Plaintiffs' Motion or a Motion to Stay or  
5 other Administrative Motion, but do not agree that a stay is appropriate.

6       **THE PARTIES HEREBY AGREE AND STIPULATE AS FOLLOWS:**

7       1. Defendants' response to the Summary Judgment Motion or Defendants' Motion to Stay or  
8 other Administrative Motion, if any, shall be due on June 13, 2012, and Plaintiffs' reply shall be  
9 due on June 27, 2012; and

10       2. Plaintiffs' Motion, currently set for hearing on June 28, 2012, is re-set for hearing on July  
11 12, 2012 at 2:00 p.m. (or on a date thereafter convenient to the Court).

12       **IT IS SO STIPULATED.**  
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1 Dated: May 29, 2012

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Dated: May 29, 2012

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*Counsel for Defendants TATA CONSULTANCY  
SERVICES, LTD. and TATA SONS, LTD.*

IT IS SO ORDERED. Plaintiffs' motion currently set for hearing on June 28, 2012, is reset for hearing on August 2, 2012, at 2:00 p.m. The case management conference previously set for Wednesday, July 25, 2012, is continued to Thursday, August 2, 2012. A case management statement is due July 26, 2012.

Dated: 6/1/2012

  
HONORABLE CLAUDIA WILKEN  
United States District Court Judge